

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
EASTERN DIVISION**

IN RE TYSON FOODS LITIGATION

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)  
) CIVIL ACTION NO.  
) 05-BE-01704-E  
)  
)  
)

**PLAINTIFFS' FIRST SUPPLEMENTAL DISCLOSURES**

In accordance with Rule 26(e) of the Federal Rules of Civil Procedure, the named, individual Plaintiffs in the above-captioned action hereby provide Defendant Tyson Foods, Inc. with Plaintiffs' first supplemental disclosures.

**A. The name and, if known, the address and telephone number of individuals likely to have discoverable information that the named, individual Plaintiffs may use to support their claims.**

1. Kelvin Battle  
90 Blakes Ferry Road  
Lineville, AL 36266

Mr. Battle is a former employee of the Defendant and is likely to have discoverable information about the working conditions at Defendant's facility in Ashland, Alabama, including the existence of a racially hostile working environment at said facility.

2. Trenee McMeans  
4082 Plant Road  
Talladega, AL 35160

Ms. McMeans is a former employee of the Defendant and is likely to have discoverable information about the working conditions at Defendant's facility in Ashland, Alabama, including the existence of a racially hostile working environment at said facility.

Dated: Birmingham, Alabama  
February 10, 2006

Respectfully Submitted,

/s/Brandy R. Owens

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CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of February, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and served via U.S. Mail to the following:

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